

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff and Counter Defendant,

And

JOHN MICHAEL GRZAN AND NAMRATA
KHIMANI

Counter Defendant,

v.

ALAN BRAM GOLDMAN;

Defendant and Counter Claimant.

Case No. 3:20-CV-01747 (PAD)

BREACH OF CONTRACT; SPECIFIC
PERFORMANCE OF CONTRACT;
REIMBURSEMENT OF FUNDS, COSTS
AND EXPENSES

JOINT MOTION INFORMING THE COURT OF THE STATUS OF DISCOVERY

TO THE HONORABLE COURT:

Pursuant to this Honorable Court's Case Management Order, Docket No. 38, Plaintiff Teal Peak Capital, LLC and Defendant Alan Bram Goldman (both parties referred hereinafter as "the Parties") respectfully submit their Joint Motion Informing the Court of the Status of Discovery as follows:

1. Pending before this Honorable Court is Defendant Alan Bram Goldman's Motion to Dismiss the Amended Complaint. *See* Docket No. 63. Defendant Alan Bram Goldman also filed a Renewed Motion to Stay Discovery and/or Order a Mediation Conference. *See* Docket No. 88.

2. For this reason, the Parties have yet to exchange their first set of interrogatories and requests for production of documents.

3. Nonetheless, the Parties will coordinate discovery following this Court's ruling on the Renewed Motion to Stay Discovery and/or Order a Mediation Conference.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 6th day of August 2021.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall notify all counsels of record.

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